

IN THE CIRCUIT COURT FOR ANNE ARUNDEL COUNTY, MARYLAND

POCAHONTAS REYNOLDS

1711 Kalmia Road NW
Washington, DC 20012

Plaintiff,

v.

C-02-CV-21-000839
Case No. _____

CVS PHARMACY, INC.

d/b/a CVS PHARMACY

One CVS Drive
Woonsocket, RI 02895

Serve:

The Corporation Trust, Inc.
2405 York Road, Suite 201
Lutherville Timonium, MD 21093

**BRINES REFRIGERATION, HEATING
& COOLING INC.**

26400 Southfield Road
Lathrup Village, MI 48076

Serve:

The Corporation Trust, Inc.
2405 York Road, Suite 201
Lutherville Timonium, MD 21093

Defendants.

COMPLAINT
(Negligence)

COMES NOW Plaintiff Pocahontas Reynolds ("Plaintiff"), by and through her attorney, Keith W. Watters, and hereby moves for judgment against Defendants CVS Pharmacy, Inc. and Brines Refrigeration, Heating & Cooling Inc. ("Defendants") on the grounds and in the amount as hereinafter set forth:

1. Plaintiff is an adult resident of the District of Columbia.
2. Defendant CVS Pharmacy, Inc. is a Rhode Island corporation with its principal place of business located at One CVS Drive, Woonsocket, RI 02895. At all times relevant herein, Defendant CVS Pharmacy, Inc. owned, operated, managed, and/or maintained CVS Pharmacy located at 975 Bay Ridge Road, Annapolis, MD 21403. At all times relevant herein, Defendant CVS Pharmacy, Inc. was acting by and through its agents, servants, and/or employees, all of whom were acting within the course and scope of their employment, for and on behalf of Defendant CVS Pharmacy, Inc.
3. Defendant Brines Refrigeration, Heating & Cooling Inc. is a Michigan corporation with its principal place of business located at 26400 Southfield Road, Lathrup Village, MI 48076. At all times relevant herein, Defendant Brines Refrigeration, Heating & Cooling Inc. was responsible for servicing, repairing, upgrading, and/or maintaining the refrigerators and freezers at CVS Pharmacy located at 975 Bay Ridge Road, Annapolis, MD 21403. At all times relevant herein, Defendant Brines Refrigeration, Heating & Cooling Inc. was acting by and through its agents, servants, and/or employees, all of whom were acting within the course and scope of their employment, for and on behalf of Defendant Brines Refrigeration, Heating & Cooling Inc.
4. This Court has jurisdiction over this action pursuant to Md. Code Ann., Cts. & Jud. Proc. § 1-501.
5. This Court has personal jurisdiction over Defendants pursuant to Md. Code Ann., Cts. & Jud. Proc. § 6-103.
6. Venue is proper in this Court because all or a substantial portion of the events or omissions giving rise to this action occurred in Anne Arundel County, Maryland.

7. On August 2, 2020, Plaintiff was a patron and lawful invitee at CVS Pharmacy located at 975 Bay Ridge Road, Annapolis, MD 21403.

8. As Plaintiff was walking from aisle two to aisle three, she tripped and fell on shelves which were left unattended on the floor.

9. Upon information and belief, an agent, servant, and/or employee from Defendant Brines Refrigeration, Heating & Cooling Inc. left the shelves unattended on the floor after servicing a freezer.

10. Plaintiff sustained immediate, severe, painful, and permanent injuries as a result of the fall.

11. At said time and place, Defendants had a duty to maintain said premises in a reasonably safe condition for persons lawfully on said premises, including Plaintiff.

12. Defendants, individually or by and through their agents, servants, and/or employees, acted with less than reasonable care and were negligent in one or more of the following ways:

- (a) Failed to properly maintain said premises in a reasonably safe condition for Plaintiff;
- (b) Failed to warn Plaintiff of the dangerous condition when Defendants knew or in the exercise of ordinary care should have known that said warning was necessary to prevent injury to Plaintiff; and
- (c) Failed to make a reasonable inspection of said premises when Defendants knew or in the exercise of ordinary care should have known that said inspection was necessary to prevent injury to Plaintiff.

13. As a direct and proximate result of the negligence of Defendants, Plaintiff has sustained severe and permanent injuries; has been prevented from transacting her business; has suffered and will continue to suffer great pain of body and mind; and has suffered permanent disability and deformity.

14. As a further direct and proximate result of the negligence of Defendants, Plaintiff has been forced to expend large sums of money for x-rays, medical treatment, and medicine for the treatment of her injuries.

WHEREFORE, Plaintiff Pocahontas Reynolds hereby demands judgment against Defendants CVS Pharmacy, Inc. and Brines Refrigeration, Heating & Cooling Inc., jointly and severally, in an amount in excess of \$75,000.00, plus interest and costs.

Respectfully submitted,

/s/ Keith W. Watters
Keith W. Watters, Esq.
(CPF # 8606010408)
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Counsel for Plaintiff

JURY DEMAND

Plaintiffs demand trial by jury as to all counts.

/s/ Keith W. Watters
Keith W. Watters, Esq.

CERTIFICATION PURSUANT TO RULE 1-313

The undersigned hereby certifies that he is admitted to practice law in the State of Maryland and is a member in good standing of the Bar of Maryland.

/s/ Keith W. Watters
Keith W. Watters, Esq.